IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS MARSHALL DIVISION

| Site Update Solutions LLC | § 8 |
|-----------------------------------|--|
| Plaintiff, | § Civil Action No. 2:10-cv-00151-DF-CE |
| | § 8 |
| v. | § JURY TRIAL DEMANDED |
| Accor North America, Inc., et al. | § |
| | § 8 |
| Defendants. | 8 |
| | 8 |

JOINT MOTION TO POSTPONE

CLAIM CONSTRUCTION-RELATED DEADLINES

The parties jointly ask the Court to delay all claim construction deadlines in the Docket Control Order (Dkt. # 364) by 3 weeks (or, for the *Markman* hearing, by 3 weeks or until the Court's next available date after that) for the following reasons.

Presently pending before the Court is Defendants' Motion to Transfer Venue (Dkt # 373). This motion is fully briefed and ripe for decision. The parties agree to this extension because it provides the Court more time to address the pending transfer motion. The parties reserve the right to seek to vacate or defer the claim construction hearing insofar as the transfer motion remains unadjudicated.

Therefore, the parties respectfully request that the Court grant this Joint Motion and postpone all proceedings relating to claim construction by three weeks, adopting the new deadlines in the proposed Order filed with this motion.

Dated: March 7, 2011 Respectfully submitted on behalf of all parties,

By: /s/ David M. Stein

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CERTIFICATE OF SERVICE

The undersigned certifies that a true and correct copy of the above document was served on March 7, 2011to all counsel of record by email.

| /s/ David Stein |
|-----------------|
| David M. Stein |

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